

## PARONICH LAW, P.C.

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### **VIA ECF**

Chief Judge Matthew W. Brann  
United States District Court Middle District of Pennsylvania

**Re:     Jackson v. Vibrant Healthcare, LLC**  
**Civil Action No. 22-cv-1221**

Dear Judge Brann,

Our firm represents the plaintiff in the above-referenced matter and we are writing to the Court following the February 27, 2024 status conference. *See* ECF No. 38.

This Court has received numerous letters and status reports regarding Vibrant Healthcare, LLC's failure to appear for its deposition. Indeed, following the February 27, 2024 status conference, this Court ordered the parties to file a motion for an extension of time to complete discovery that would permit the Defendant to appear for its deposition (which it has failed to appear for twice). At no time has the Defendant provided the dates for its deposition to occur. As such, at this point the Plaintiff believes the Court should issue an Order to Show Cause to the Defendant requiring it to explain its basis for its continued failure to participate in the Court Ordered deposition.

Respectfully Submitted,  
*/s/ Anthony I. Paronich*  
Anthony I. Paronich

cc: All Counsel of Record (Via ECF)